

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

AHMED ELZEIN,

Plaintiff,

v.

ASCENSION GENESYS HOSPITAL,

Defendant.

Case No. 22-12352

Hon. Sean F. Cox

Magistrate Judge Curtis Ivy, Jr.

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STEMPIEN LAW, PLLC  
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**DEFENDANT’S PRELIMINARY TRIAL WITNESS LIST**

Defendant Ascension Genesys Hospital (“AGH” or “Defendant”), through its undersigned counsel, hereby submits the following Preliminary Trial Witness List of individuals who may testify at trial of this matter:

1. Plaintiff Ahmed Elzein, c/o Plaintiff’s counsel.
2. Natalia Baj-Osiewicz, MD, c/o Defendant’s counsel.
3. Bradley R. Caloia, DO, c/o Defendant’s counsel.

4. Marney Daugherty, c/o Defendant's counsel.
5. Andrew Dolehanty, DO, c/o Defendant's counsel.
6. Tammy Gauthier, c/o Defendant's counsel.
7. Kathleen Scott (Hadden), c/o Defendant's counsel.
8. Helena Kurowski, c/o Defendant's counsel.
9. Rachel Marble, RN, c/o Defendant's counsel.
10. Barbara Pawlaczyk, MD, c/o Defendant's counsel.
11. Andrew Vosburgh, MD, c/o Defendant's counsel.
12. HimaBindu Yarlagaadda, MD, c/o Defendant's counsel.
13. Brett Haschig, DO, c/o Defendant's counsel.
14. William Ellis, MD, c/o Defendant's counsel.
15. Burhan M. Tajour, MD, c/o Defendant's counsel.
16. Reginald Sandy, DO, c/o Defendant's counsel.
17. Malcolm S. Cohen, Ph.D. of Employment Research Corporation,  
305 E. Eisenhower Pkwy., Suite 316, Ann Arbor, MI 48108.
18. Elissa P. Benedek M.D., FacPsych, 36-7 Chatham Way, Ann  
Arbor, MI 48105.
19. Investigator or other custodian of records from the Equal  
Employment Opportunity Commission ("EEOC").
20. Investigator or other custodian of records from the Michigan  
Department of Civil Rights ("MDCR").

21. Representatives of and custodians of records for Plaintiff's current, past, and prospective employers or contractor agencies, c/o their respective entities.
22. Representatives of and custodians of records for Plaintiff's current and past treating physicians and medical providers that are relevant to Plaintiff's liability and damages claims, c/o of their respective entities.
23. Representatives of and custodians of records for Plaintiff's educational entities, c/o of their respective entities.
24. All persons, not objected to by Defendant, identified in all pleadings, interrogatory answers and depositions.
25. All persons, not objected to by Defendant, identified in those documents produced during discovery.
26. Any persons, not objected to by Defendant, who were deposed in this action.
27. All persons identified by Plaintiff and not objected to by Defendant, whether called or not.
28. All other necessary rebuttal witnesses, including lay and experts, as necessary.

Defendant reserves the right to amend its Witness List and to add additional witnesses as they become known through the course of discovery.

Respectfully submitted,

JACKSON LEWIS P.C.

By: /s/ Daniel C. Waslawski  
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Dated: September 8, 2023

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing instrument was served upon all parties in the above case at their respective addresses disclosed on the pleadings on September 8, 2023 by:

☐ Hand Delivery  
☒ ECF

☐ U. S. Mail and Email  
☐ FAX

/s/ Daniel C. Waslawski  
DANIEL C. WASLAWSKI

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